

DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Benjamin S. Kaminetzky
James I. McClammy
Marc J. Tobak
Gerard X. McCarthy

*Counsel to the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,
Debtors.¹**

Chapter 11

**Case No. 19-23649 (RDD)
(Jointly Administered)**

**DECLARATION OF BENJAMIN S. KAMINETZKY
IN SUPPORT OF DEBTORS' OBJECTION TO TIG'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY**

I, Benjamin S. Kaminetzky, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner of the law firm Davis Polk & Wardwell LLP, 450

Lexington Avenue, New York, New York 10017, counsel for the debtors and debtors in

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

possession in the above-captioned action (the “**Debtors**”). I respectfully submit this Declaration in Support of the Debtors’ Objection to TIG’s Motion for Relief from the Automatic Stay.

2. A true and correct copy of the insurance policy bearing policy number XLX 38822862 / XEX 37690728 (the “**Policy**”) is attached hereto as Exhibit A.

3. I understand that TIG is one of the nineteen insurers who provide the Debtors and their affiliates with the remaining approximately \$725 million of approximately \$1 billion of general liability coverage, including product liability coverage, for which at least one occurrence was reported in 2001. The nineteen insurers provide coverage under more than a dozen different insurance policies, many of which include arbitration provisions.

4. I understand that no covered entity has made a demand for coverage under the Policy.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: January 17, 2020
New York, New York

/s/ Benjamin S. Kaminetzky
Benjamin S. Kaminetzky